

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Hearing Date:**

**TBD**

**Objection Deadline:**

**September 14, 2023, at 4:00 p.m. (ET)**

**NOTICE OF MOTION TO FILE UNDER SEAL (I) REPLY IN FURTHER SUPPORT  
OF MOTION OF HON HAI PRECISION INDUSTRY CO., LTD. (A/K/A HON HAI  
TECHNOLOGY GROUP), FOXCONN EV TECHNOLOGY, INC., AND FOXCONN  
EV SYSTEM LLC TO DISMISS, OR, IN THE ALTERNATIVE, CONVERT THE  
BANKRUPTCY CASES AND (II) DECLARATION OF MICHAEL C. WHALEN**

**PLEASE TAKE NOTICE** that Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, the “Movants” or “Foxconn”)<sup>2</sup> filed the *Motion to File Under Seal (I) Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases and (II) Declaration of Michael C. Whalen* (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held before the Honorable Mary F. Walrath, United States Bankruptcy Judge on a date to be determined.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **September 14, 2023, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”); and (c) be served so as to be received on or before the Objection Deadline by the undersigned counsel Foxconn.

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<sup>1</sup> The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> The Movants are limited to those entities named in the Debtors’ Adversary Complaint that are subject to the jurisdiction of this Court. At the appropriate time and if necessary, Foxconn will seek relief for those entities that are without the Court’s jurisdiction.

Dated: August 31, 2023  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL  
LLP**

/s/ Matthew O. Talmo

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